

UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF MICHIGAN

In Re:

Case No. DG 10-09162

ANNEMARIE McDONALD,

Chapter 7: Filed: 7/26/10

Debtor.

Honorable Scott W. Dales

MOTION TO COMPEL TURNOVER

NOW COMES Chapter 7 Trustee Jeff A. Moyer ("Trustee"), by and through his attorneys, The Bankruptcy Group, Inc., and states as his Motion to Compel Turnover to the Court the following:

1. Annemarie McDonald ("McDonald" or "Debtor") filed a voluntary Chapter 7 petition for relief on July 26, 2010.
2. Jeff A. Moyer ("Trustee" or "Movant") is the duly-appointed, qualified and acting Chapter 7 Trustee in this case.
3. The Trustee requests turnover from Ms. McDonald the amount of \$86,480.08 representing the non-exempt funds she received post-petition from her mother's trust, the Kathleen Anne McDonald Trust, as a beneficiary to the trust.
4. The Debtor received the funds in question based upon the passing of the Debtor's Mother within 180 days after the filing of the Chapter 7 petition (*See* §541(a)(5)).
5. The personal property involved is not of inconsequential value nor without benefit to the estate.
6. Ms. McDonald is required to turn over the non-exempt and undisclosed funds in question to the Trustee and has not yet done so (*See* Fed.R.Bkrtcy.P. 1007(h); §542(a)).

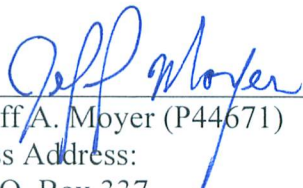
WHEREFORE, Trustee Jeff A. Moyer requests this Court to enter an Order granting the following relief:

- A. Requiring the immediate turnover by Ms. McDonald the amount of \$86,480.08 representing the non-exempt funds she received from her mother's trust post-petition; and
- B. Grant such other or further relief as this Court deems just and proper.

Respectfully submitted,

THE BANKRUPTCY GROUP, INC.
Attorneys for Trustee Jeff A. Moyer

Dated: January 16, 2014

By: 
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